

State of Tennessee
IN THE CHANCERY COURT FOR HAMILTON COUNTY

TINA RAULSTON

PLAINTIFF

v.

DOCKET NO. 11-0777

SUNTRUST MORTGAGE, INC.
DEFENDANT

SUMMONS

TO DEFENDANT: SUNTRUST MORTGAGE, INC. c/o Registered Agent

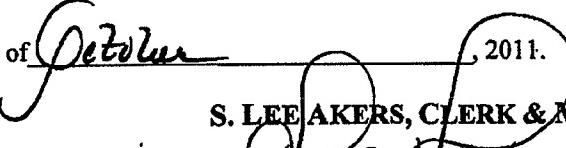
WHOSE ADDRESS IS CORPOATION SERVICE COMPANY, 2908 POSTON AVE, NASH., TN 37203

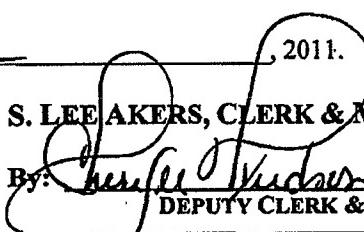
OTHER SERVICE INFORMATION PLAINTIFF WILL SERVE

You are summoned and required to Answer and make defense to a Complaint herewith served upon you. Your Answer to the Complaint must be filed and served upon plaintiff's attorney on or before thirty (30) days after service of this Summons and Complaint upon you, exclusive of the day of service. Your Answer must be filed in the OFFICE OF THE CLERK & MASTER, Hamilton County Courthouse, Suite 300, 201 East 7th Street, Chattanooga, Tennessee 37402. You are also required to serve a copy of your Answer upon the plaintiff's attorney, or the *pro se* plaintiff as set out below. If you fail to do so, judgment by default will be taken against you for the relief demanded in the Complaint.

ISSUED & TESTED this 6th day of October

, 2011.


S. LEE AKERS, CLERK & MASTER


By: Cheryl D. Walker
DEPUTY CLERK & MASTER

<u>Randall D. Laramore</u>	<u>18760</u>
Plaintiff's Attorney	BPR#
or Plaintiff if no attorney (<i>pro se</i>)	
_____ <u>19 Patten Parkway</u>	
Address	
_____ <u>Chattanooga, TN 37402</u>	
_____ <u>423-756-6770</u>	
Tel. No.	<u>423-756-0009</u>
	Fax No.

NOTICE TO DEFENDANT(S)
Tennessee Code Annotated § 26-2-103 provides a \$4,000.00 personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk & Master. The list may be filed at any time and may be changed by you thereafter as necessary; however unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you, would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

SUMMONS RETURN

I received this summons on _____ I certify and return that on _____, I
(Date) (Date)

served this summons and a complaint on defendant, _____
(Printed Name of Defendant)

in the following manner:

failed to serve this summons within thirty (30) days after its issuance because _____

Process Server Name (Printed)

Process Server Signature

Address

IN THE CHANCERY COURT OF
HAMILTON COUNTY, TENNESSEE

TINA RAULSTON, : Case No. 11-0777
Plaintiff, :
V. : Part _____
SUNTRUST MORTGAGE, INC., : Jury Demand
Defendant. :

COMPLAINT

Comes the Plaintiff, Tina Raulston, by and through Counsel, and sues the Defendant, SunTrust Mortgage, Inc., (hereinafter referred to as Defendant or "SunTrust Mortgage") and for her cause of action states:

I. Jurisdiction

1. Jurisdiction in this case is invoked for violation of the Age Discrimination in Employment Act (ADEA), 29 U.S.C. § 621, *et.seq.*
2. Plaintiff, Tina Raulston, is, and was at all times material herein, a citizen and resident of Hamilton County, Tennessee.
3. Defendant, SunTrust Mortgage, Inc., is a foreign corporation, registered to do business in the State of Tennessee. SunTrust can be served through its Registered Agent for Service of Process: Corporation Service Company, 2908 Poston Ave., Nashville, Tennessee, 37203.
4. Plaintiff is a female over the age of forty-five (45) and is entitled to have her right to gainful employment protected and untainted by discrimination based on her age.
5. The acts complained of herein occurred primarily at Defendant's facilities in Hamilton County, Tennessee where the Plaintiff was assigned as a result of her employment.

Raty, Rymer, and Ulin, P.C.

ATTORNEYS AT LAW
19 PATTEN PARKWAY
CHATTANOOGA, TENNESSEE
37402-2297

II. General Allegations

6. Plaintiff, Tina Raulston's date of birth is [REDACTED] 1962.
7. Plaintiff was hired by Defendant, SunTrust Mortgage in April of 2002, to work as a Mortgage Loan Processor.
8. During her employment, Plaintiff performed her job duties acceptably within the guidelines established by Defendant and received positive feedback from her superiors.
9. In July of 2009, however, Plaintiff began to become subject to heightened scrutiny of her work performance.
10. Although Plaintiff improved her performance, Plaintiff did not receive a raise in 2009, as did her younger co-workers.
11. On or around July 9, 2010, Plaintiff was given a back-dated discipline for performance issues. At this time, Plaintiff's performance was comparable to her younger co-workers.
12. By August of 2010, Plaintiff's performance had improved above that of her co-workers. Despite this performance, Plaintiff was terminated on September 13, 2010.
13. Plaintiff was replaced by a significantly younger employee.
14. At the time of her termination, Plaintiff's performance was equal to or superior to that of her younger co-workers.
15. Plaintiff was terminated based on her age.

III. Cause of Action

16. Plaintiff charges and alleges that because of the discrimination to which she was subjected, Defendant is guilty of violations of the Age Discrimination in Employment Act, 29 U.S.C. § 621, *et seq.*

Rymer, and Ullin, P.C.

ATTORNEYS AT LAW
19 PATTEN PARKWAY
CHATTANOOGA, TENNESSEE
37402-2297

IV. Damages

17. As a direct and proximate result of the acts and omissions of the Defendant, Plaintiff has suffered lost wages, physical injury, emotional injury, mental pain and suffering, embarrassment, humiliation and general damages.

V. Relief Sought Against Defendants

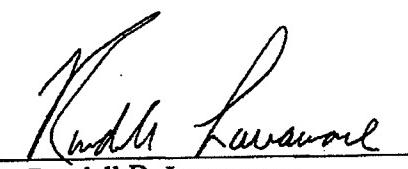
WHEREFORE, Plaintiff, Tina Raulston, prays that proper process issue and be served upon the Defendants in this action in the manner prescribed by law; and

WHEREFORE, Plaintiff demands judgment against the Defendant for compensatory damages, punitive damages, plus reasonable attorney fees and all costs; and

WHEREFORE, Plaintiff demands a jury to try all issues, when joined.

Respectfully submitted,

PATY, RYMER AND ULIN P.C.

By: 

Randall D. Laramore
BPR # 18760
Attorneys for Plaintiff
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Chattanooga, TN 37402
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(423) 756-6770

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CHATTANOOGA, TENNESSEE
37402-2267



CLERK & MASTER
CHANCERY COURT OF TENNESSEE
ELEVENTH JUDICIAL DISTRICT OF TENNESSEE
CHATTANOOGA, TENNESSEE



ADA: PUBLIC NOTICE

This notice is provided as required by Title II of the AMERICANS WITH DISABILITIES ACT OF 1990, 42 U.S.C. 12131, et seq., T.C.A. § 16-3-803, and Tennessee Supreme Court Rule 45.

The AMERICANS WITH DISABILITIES ACT (ADA) prohibits discrimination against any qualified individual with a disability. The Tennessee Judicial Branch does not permit discrimination against any individual on the basis of physical or mental disability in accessing its judicial programs. In accordance with the ADA, the Tennessee Judicial Branch will provide reasonable modifications, if necessary, in order for any qualified individual with a disability to access all of its programs, services and activities.

If you require a modification to access the judicial program and/or have special needs because of a qualified disability, you must submit a written ADA Request for Modification to the Local Judicial Program ADA Coordinator listed below at least 5 business days prior to the date of the judicial program, if possible. A form is available from the Local Judicial Program ADA Coordinator or from the Tennessee Judicial Program ADA Coordinator. <http://www.tsc.state.tn.us>

If you need assistance, have questions or need additional information please contact either:

Julie Taylor
State Judicial Program ADA Coordinator
Administrative Office of the Courts
Nashville City Center, Ste 600
511 Union St.
Nashville, TN 37243
1-800-448-7970
adacoordinator@tscmail.state.tn.us

The Tennessee Judicial Branch Americans with Disabilities Act Policy Regarding Access to Judicial Programs, as well as Request for Modification form may be found online at:

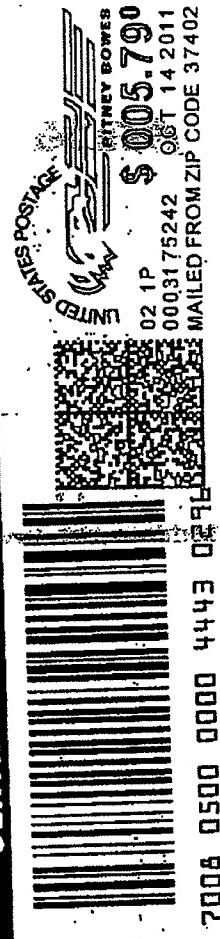
www.tsc.state.tn.us

Page 1 of 1 page.

PUBLIC NOTICE: AMERICANS WITH DISABILITIES ACT
REV. 2007.01.19

LAW OFFICES
Davy Rymer and Min, P.C.
18 PATTEN PARKWAY
CHATTANOOGA, TENNESSEE 37402-2297

CERTIFIED MAIL



Suntrust Mortgage Inc.
c/o Registered Agent:
Corporation Service Company
2908 Poston Avenue
Nashville, TN 37203

37203-1312